

1 evidence altogether. But on the, the point Mr. Schauble just
2 made, the fact that the parties stipulated to it in Metroplex
3 doesn't detract from the fact that the Commission found it
4 relevant, because it came out in the Commission's decision in,
5 in Metroplex. So if the Commission relied on it in, in, in
6 Metroplex, so, I mean, it's, it's by definition relevant.

7 JUDGE CHACHKIN: What about the -- his objection to
8 the use of the different elements --

9 MR. EMMONS: Well, the --

10 JUDGE CHACHKIN: -- for the different types of
11 programs?

12 MR. EMMONS: Well, the, the -- there -- the testi-
13 mony and other evidence describes the, the nature of the
14 various programs that are talked about and the, the logs use
15 designations and they simply reflect what they reflect.
16 There, there was no basis -- no effort by Trinity in present-
17 ing this case to make judgements about, about the programs
18 that were reflected by the logs or, or to make judgements
19 about the content, or the, the description of programs based
20 upon their, on their designation that the designator used in
21 the logs. The, the evidence as to the -- what the nature and
22 description of the programs is comes primarily in the testi-
23 mony of, of Mr. Everett here, and, and in -- and, also, and,
24 of course, in the issues programs lists that are offered,
25 there is substantial descriptions of, of particular programs,

1 and kinds of programs which describe generally what the format
2 was, and the kinds of issues that were discussed, and the
3 kinds of guests who appeared on them, and so forth. So the
4 evidence taken all together provides a basis for the
5 Commission to make a determination about the kinds of program-
6 ming that were broadcast during their renewal term and, and
7 this is part of that presentation, Your Honor.

8 MR. SCHAUBLE: Your Honor --

9 JUDGE CHACHKIN: Well, what do these logs show?
10 Well, for instance, I see logs here which show categories
11 which the Commission has dispensed with. I mean, the
12 Commission focuses on news, public affairs, and other program-
13 ming.

14 MR. EMMONS: Well, in terms of the --

15 JUDGE CHACHKIN: I don't see any -- what is public
16 affairs here? Is there any, is there any breakdown here as to
17 the amount of minutes of -- for each category in terms of
18 news, and public affairs, and other programs?

19 MR. EMMONS: Yes, it's not in this exhibit,
20 Your Honor. It will be in Exhibit 35.

21 JUDGE CHACHKIN: Thirty-five?

22 MR. EMMONS: I haven't gotten to it yet but
23 Exhibit 35 is the, the arithmetical breakdown, statistical
24 breakdown, of various categories of programs that were
25 reflected in the logs, and --

1 JUDGE CHACHKIN: Now, your objection is to use of a
2 composite week log as a determinant of the type of programs
3 the station presented, is that -- general use of it, that's
4 your objection?

5 MR. SCHAUBLE: Yes, Your Honor.

6 JUDGE CHACHKIN: On the grounds that the Commission
7 doesn't require it any more, therefore it can't be used?

8 MR. SCHAUBLE: Well, I -- absent of the agreement
9 that the parties have to use it, that's correct, Your Honor,
10 and I also believe that, you know, community -- the informa-
11 tion that's relevant concerning their programming is shown --
12 contained in other, other portions of the -- in other parts of
13 their Exhibits 32 and 33.

14 JUDGE CHACHKIN: And what is, what is that? What
15 tab is that?

16 MR. SCHAUBLE: For instance, Tab H and HH are -- of
17 Exhibit 33, are their issues programs list, which provide
18 specific descriptions of programs, whether it's news -- I
19 mean, whether it's network or local programs, the type it's
20 considered, the air date, the time, and the duration of the
21 programming in question. Here, all these program logs provide
22 is a, is the title of a program and a characterization, and I
23 think the specific problem with these is that when, as I
24 mentioned previously, the Commission, when the Commission
25 required the composite week information, they had very spe-

1 cific definitions as to what category each, each type of
2 program fell into, and here we have, we have the categories
3 but we don't have the definitions of the category, and as I
4 explained previously, there, there seems to be some sort of
5 question as to --

6 JUDGE CHACHKIN: Well, isn't that the purpose of
7 cross-examination, to find out how they reached these conclu-
8 sions?

9 MR. SCHAUBLE: Your Honor, Mr. Everett, in my under-
10 standing, Mr. Everett was not the person who prepared these
11 program logs.

12 JUDGE CHACHKIN: Well, who did?

13 MR. SCHAUBLE: My understanding is that they were
14 prepared by TBN headquarters.

15 JUDGE CHACHKIN: Well, who is responsible for these
16 classifications?

17 MR. SCHAUBLE: It doesn't appear to be, on the state
18 of the record, it doesn't appear to be Mr. Everett because in
19 paragraph 24, he, with respect to the "Feedback" program,
20 which is one of their public affairs programs, he disagrees
21 with the categorization.

22 JUDGE CHACHKIN: But who's sponsoring this exhibit?

23 MR. EMMONS: Well, this is Mr. Everett's exhibit.

24 The --

25 JUDGE CHACHKIN: Did he make the classifications?

1 MR. EMMONS: No, the, the logs were generically --
2 the form, the form of the logs were prepared by Trinity
3 Broadcasting Network headquarters. There is in Exhibit 35
4 from Ms. Lindy -- I'm sorry, I think it's 34 -- from
5 Ms. Lindy Dressler, who was based at headquarters and dis-
6 cusses the, the process. If I can find Exhibit -- she was in
7 Exhibit 34. Ms. Dressler was supervisor/coordinator of pro-
8 gramming during the relevant time period, and discusses the
9 various, the various programs that were broadcast on, on this
10 station.

11 JUDGE CHACHKIN: Yes?

12 MR HONIG: If, if that's so, then I'm still a little
13 confused. Exhibit 34, Miss Dressler's declaration doesn't
14 define the program categories. Exhibit 35, which is
15 Christopher Holt's declaration, page 3 describes a logging and
16 description of categories which is the one place that we found
17 this, but even there it does not define those categories, so
18 that what seems to have happened is, is, is a circle of people
19 making definitions, none of which are provided for the record.

20 MR. EMMONS: Well, Your Honor, the, the Commission
21 has always relied upon stations to define the, the programming
22 that makes up the categories that, when the Commission used to
23 require and handle programming reports, for example, it had
24 designations.

25 JUDGE CHACHKIN: But it had to fit within the

1 definitions of the Commission. The station couldn't make up
2 its own -- classify something as public affairs if it didn't
3 fit within the definition that the Commission gave for public
4 affairs.

5 MR. EMMONS: Well, but -- that, that's quite right,
6 but the, but the, but the station had to exercise discretion
7 on any given program as to whether or not the, the, the pro-
8 gram fit within one category that the Commission defined or a
9 different category that the Commission defined, and so
10 Commission discretion has always been at work in, in that.
11 Now, I think Your Honor's point is certainly a point well
12 taken. The, the board has had the opportunity to -- if they,
13 were mystified about the content of these programs based on
14 the descriptions in various places in the, in the evidence
15 that we've offered as to what the programs consisted of, they,
16 they could question the witness about it, but I, I'm noticing,
17 for example, just as a, a, a -- if you're looking at page 53
18 of Tab HH of Exhibit 33, just as I just happened to turned to
19 it, there's a program categorized as "PA/O," and it talks
20 about how on that particular program there was a discussion
21 of, of homeless people, there was a discussion of domestic
22 abuse, children becoming homeless, the poverty cycle, so it,
23 it, the record, does provide a, a basis for the Commission and
24 fact-finder here making determinations as to what this
25 licensee meant when it used the designation of "public affairs

1 or other," and there's considerable evidence. These exhibit
2 are very thick, as you can see, Your Honor, so there's an
3 awful lot of evidence in there on which to base these find-
4 ings.

5 JUDGE CHACHKIN: Mr. Honig?

6 MR. SCHAUBLE: And, Your Honor, to be fair, and,
7 and --

8 JUDGE CHACHKIN: Go ahead, Mr. Honig.

9 MR HONIG: Oh, Your Honor, I -- Mr. Emmons' point
10 is, is, is well taken that perhaps licensees, in the absence
11 of, of an, an applicable Commission definition of these terms,
12 have the right to create their own definitions, but that isn't
13 the nature of -- I, I -- of the objection which, which I think
14 Mr. Schauble and I are making. It is that nowhere in this
15 direct case testimony are those definitions provided, nor is
16 there a statement that these -- that the definitions that the
17 Commission previously used are being adopted. Since this is
18 direct case testimony, it isn't our burden to provide or --
19 those, those definitions. Absent the definitions, whatever
20 they are, all of this direct case testimony is incompetent
21 and, and ought to be rejected.

22 MR. SCHAUBLE: Your Honor, with respect to
23 Mr. Emmons' point about what Your -- Mr. Emmons referred to
24 the issues programs log, which contains information, to the
25 extent that the program logs contain some of the information

1 | which is contained in the list of programs, that the programs
2 | themselves -- the logs themselves are cumulative and pro-
3 | vide -- add absolutely nothing to the record.

4 | JUDGE CHACHKIN: Well, is there somewhere in here
5 | the -- any, any explanation of what was done here, the method-
6 | ology, definitions? Is that provided here, what was used by
7 | the parties who, who prepared these logs?

8 | MR. EMMONS: Well --

9 | JUDGE CHACHKIN: And defined these logs and their
10 | categories?

11 | MR. EMMONS: Well, Your Honor, the, the, the defini-
12 | tions in the -- or the, the designations in the logs are all
13 | categories that the Commission had prescribed when it was
14 | doing this. I mean, these are the ones that we're all famil-
15 | iar with, those of us who practiced long enough: educational,
16 | religious, entertainment, public affairs, commercial announce-
17 | ment, news, religious, public affairs, other, editorial,
18 | sports, promo. Those are all straight from what the
19 | Commission always, always defined them, and I, I think that --
20 | PSA is another example.

21 | MR. SCHAUBLE: Your Honor, there are also hybrid
22 | categories in here that are used: instructional/religious,
23 | religious/public affairs, public affairs/other.

24 | MR. EMMONS: Well, those are the combinations of --

25 | JUDGE CHACHKIN: Is there any indication of how many

1 minutes there were of each?

2 MR. EMMONS: No, not, not, not within the, the
3 single program. It's not broken down as to how much was
4 instructional and how much was public affairs or --

5 JUDGE CHACHKIN: Well, how did you then come up with
6 totals?

7 MR. EMMONS: Well, we describe that, Your Honor.
8 What we did was where there was a hybrid -- this is now -- I'm
9 referring to Exhibit 35, Mr. Holt's testimony, the -- on
10 page 4, paragraph 4, where there was a dual designation, for
11 example, "R/ED," which would be religious/educational, it was
12 counted as religious as the -- we took the first of the desig-
13 nators and counted the programming as being in that category.
14 We did not make any attempt to, to guess at how much of the
15 program was, was in the second category. There would be no
16 way from the logs to make that determination, but we did
17 describe the, the methodology we used in great detail, I
18 think, in, in Exhibit 35.

19 MR HONIG: Well --

20 JUDGE CHACHKIN: Yes, Mr. Honig?

21 MR HONIG: Your, Your Honor, the difficulty I have
22 with this is that we're hearing here for the first time today,
23 well after the exchange date, what the definitions were.
24 We're having a representation from counsel that the
25 Commission's former definitions were, were used, but

1 | regrettably it's too late for that. That should have --
2 | whatever was being used ought to have been in these exhibits
3 | themselves in, in a form in which we could have evaluated them
4 | at the time they were exchanged.

5 | MR. SCHAUBLE: Your Honor, can I give an example of
6 | the sort of problems I see with the definitions?

7 | JUDGE CHACHKIN: Go ahead.

8 | MR. SCHAUBLE: They -- "Joy Junction" which is a
9 | children's program, was logged as a religious program. I'm
10 | not sure that would strictly fall within the Commission's --
11 | would, would be, necessarily be, consistent with the
12 | Commission's definitions of the -- under the annual program-
13 | ming report. "Dallas Home," a, a program that featured con-
14 | temporary Christian videos was logged as a religious program
15 | as opposed to an entertainment program, and so I think there
16 | are questions here concerning the sort of methodology and
17 | whether Your Honor can make valid findings.

18 | JUDGE CHACHKIN: Yeah, but that comes under the
19 | category "other programs." I'm concerned about news and
20 | public affairs.

21 | MR. SCHAUBLE: And you -- well, with respect to the
22 | public affairs, Your Honor --

23 | JUDGE CHACHKIN: And those are the categories the
24 | Commission uses, is it not, news, public affairs, and other
25 | programming?

1 MR. SCHAUBLE: Yeah.

2 MR. EMMONS: And, and many others.

3 MR. SCHAUBLE: On, on, on public affairs,
4 Your Honor, I think, Trinity, TBF, has already made an exhaus-
5 tive showing concerning its two main -- certainly its two
6 locally produced public affairs programs, and also other
7 programs which are considered to be network programs, which it
8 considers to be public affairs programming, and that, there-
9 fore, I think with respect to those programs, the religion --
10 the program logs would add nothing. The, the issues programs
11 lists in the direct -- its exhibit make clear what clear what
12 time period those, those programs ran, the description of what
13 happened during specific programs, and material such as that;
14 and with respect to the news, there's no, in the direct case,
15 in Mr. Everett's testimony, there is no mention of news what-
16 soever. This is a licensee that did not run any local news
17 during the renewal period.

18 MR HONIG: Your Honor, the, the -- to add to that,
19 the, the difficulties with these definitions or lack, lack of
20 them is found in the summary which is, is provided on page 5
21 of Exhibit 35, which is Mr. Holt's testimony. There you, you
22 see that public affairs/other, 24.7 percent; religious/public
23 affairs, 3.2; public affairs/news, 2.4. Even if one assumes
24 that the Commission's definitions were somehow hybridized,
25 it's impossible to ascertain from this how much, if any,

1 public affairs programming, as the Commission would have
2 defined it, has been run.

3 JUDGE CHACHKIN: Well, we'll just have to call
4 Mr. Holt, and if he can't provide a, a voir dire, and he can't
5 provide a reasonable explanation, we'll have to reject the
6 exhibit.

7 MR. EMMONS: Well, Your Honor, on that point, all
8 Mr. Holt will testify -- we did have an informal voir dire the
9 other day -- all he would testify would be that we simply took
10 the information from the log and put it into this Exhibit 35.
11 We, we did not make any judgements about, about definitions
12 or, or program content, or anything else. This was simply a
13 means of putting into tabular summary form the information
14 that appears in the log. We, we exercised no judgement at
15 all. We deliberately --

16 JUDGE CHACHKIN: Well, all I'm prepared to rule at
17 this time is that I have no problem with you using composite
18 week logs to demonstrate what the programming consisted of. I
19 don't think the Commission has prohibited a party from using
20 any method which is reasonable for demonstrating its
21 programming, notwithstanding that the Commission has --
22 doesn't require licensees to keep logs. The question of the
23 competency of these particular logs is another question. I
24 mean, this will have to come out in cross-examination or in
25 qualifying question of the witnesses, and if you can't estab-

1 lish that there's a reasonable basis for the log analysis,
2 then obviously they won't be able to be considered, they won't
3 be able to be accepted. I don't know what's contained here,
4 perhaps there is a reasonable basis, but at least counsel
5 indicate that there is no definitions here and there's no way
6 of knowing whether the parties who, who classified this mate-
7 rial actually used the Commission's definition, used their own
8 definition, or, or how they did it. Is there, is there some-
9 thing here indicating who was responsible for the preparation
10 of these logs, and the methodology, and what, what they
11 decided classifications would be for these logs, what defini-
12 tions they used? Was it arbitrary or was it based on
13 Commission definitions, or just what is it based on?

14 MR. EMMONS: Well --

15 JUDGE CHACHKIN: Is there anything in here which
16 deals with that?

17 MR. EMMONS: Your Honor, to my knowledge, there is
18 no testimony that addresses that point but the, but the logs
19 themselves do reflect program categories that are, or were,
20 the Commission's categories when the Commission had
21 categories.

22 JUDGE CHACHKIN: Well, that doesn't mean anything.
23 I mean --

24 MR. EMMONS: And, and beyond that, Your Honor --

25 JUDGE CHACHKIN: As I understand, you said, as I

1 understand it, these logs deal with the period after the
2 Commission required logs to be kept, is that true?

3 MR. EMMONS: Correct, Your Honor

4 JUDGE CHACHKIN: Therefore, there was no reason for
5 the station to adhere to the Commission log requirements. It
6 could have used an arbitrary -- arbitrarily identified, made
7 up its own classifications. I don't know what it did.

8 MR. SCHAUBLE: Maybe there's something in --

9 JUDGE CHACHKIN: Now, is there something here in
10 these, in these -- in Mr. Everett's testimony or anyone else's
11 testimony saying how it kept these logs, or for that matter,
12 for what purpose it kept these logs?

13 MR. EMMONS: Your Honor, I don't believe there's
14 testimony that discusses how the logs were kept or for what
15 purpose they were kept. There is a lot of evidence in the
16 form of the issues programs list, for example, and in the form
17 of discussions by witnesses for particular programs as to what
18 the content of those, those programs was, and from that evi-
19 dence the Commission can certainly find that the program
20 "Feedback," for example, was -- addressed public affairs
21 issues, or were, were issue-responsive, discussed issues of,
22 of concern to the community as, as developed in the ascertain-
23 ment process, and there's substantial testimony from, I
24 believe, Ms. Downing and Ms. Dressler that -- about the ascer-
25 tainment process, and about the establishment of programs, and

1 the inviting of guests on the programs, the topics that would
2 be discussed on the programs as a result of the ascertainment
3 process, and, and so there's a great deal of discussion that,
4 that talks about the program content of these -- of particular
5 programs --

6 JUDGE CHACHKIN: But that has nothing to do with
7 these logs.

8 MR. EMMONS: Well --

9 JUDGE CHACHKIN: I mean, that's another proof you're
10 offering to show the station's programming. This is, is
11 something different. These logs you're offering as indepen-
12 dent, an independent basis of proof, and all I'm saying is
13 there anything here qualifying these, these logs and the use
14 of these logs?

15 MR. EMMONS: Well, but --

16 JUDGE CHACHKIN: I mean, I don't understand what
17 this has to do with the issues programs lists.

18 MR. EMMONS: Well --

19 JUDGE CHACHKIN: They're not kept in the same way as
20 logs are kept.

21 MR. EMMONS: No, no. No, I was, I was speaking,
22 though, to the point about what, what the licensee considered
23 to be public affairs, and what the licensee considered to be
24 news, for example, or, or any other particular kind of pro-
25 gramming. That information is apparent from the -- all of the

1 discussion by other witnesses of the, of the particular pro-
2 grams, and the formats, and the guests, and the subjects, and
3 the titles, and, and the issues that were discussed on those
4 programs.

5 JUDGE CHACHKIN: Yeah, but logs were kept contempo-
6 raneously with the running of the program based on the program
7 content of each particular program. That's a far cry from
8 broadly describing a program which you're offering under the
9 efforts responsive list, and the question is here, how were
10 these logs kept and how were they defined? What, what was the
11 classifications? They weren't required to keep them at that
12 time. Now, is there some witness who could testify about
13 this?

14 MR. EMMONS: There, to my knowledge, Your Honor,
15 there is no witness who testifies as to the definitions of the
16 classifications. There is testimony as to generally the --
17 how the procedures by which the logs were prepared.

18 JUDGE CHACHKIN: The logs were prepared -- there is,
19 there is testimony to that?

20 MR. EMMONS: There is testimony on that, Your Honor,
21 yes, so -- but I don't believe there's testimony on the sub-
22 ject of how the definitions and the classifications -- who,
23 who developed, you know --

24 JUDGE CHACHKIN: Well, what was --

25 MR. EMMONS: -- the definitions of the log classifi-

1 cations that appear.

2 JUDGE CHACHKIN: Well, who kept these logs?

3 MR. EMMONS: Well, that's, that's addressed in the
4 testimony, Your Honor, in, I believe, Exhibit 34,
5 Ms. Dressler. If not Ms. Dressler, then -- well, para-
6 graph 24 -- excuse me, Your Honor, Exhibit 32, which is
7 Mr. Everett.

8 (Asides.)

9 JUDGE CHACHKIN: For instance, I see a name
10 "Darrell E. Roberts." Who, who is he? Is he an employee of
11 the station?

12 MR. EMMONS: I'm sorry, where, where are you refer-
13 ring to that, Your Honor?

14 JUDGE CHACHKIN: Well, I, I -- just turning page 31,
15 it says, "Page 6 of the log of March 22nd, 1988." It has
16 Darrell E. Roberts signing off on it, on 4 p.m.

17 MR. EMMONS: I, I can't find the page reference,
18 Your Honor, but I assume that that's one of the operators, the
19 log operators, the station operator who was on duty at that
20 time.

21 JUDGE CHACHKIN: Well, that's what I'm assuming.

22 MR. EMMONS: Your Honor, in paragraph 7 --

23 JUDGE CHACHKIN: If someone is -- is there some --
24 did anyone instruct these operators as to how they should keep
25 these logs or what they should -- classifications they should

1 use?

2 MR. EMMONS: Your Honor, page -- Exhibit 32, which
3 is Mr. Everett, paragraph 24 on page 15 describes the, gener-
4 ally, the log-keeping process and procedure.

5 JUDGE CHACHKIN: Paragraph 15?

6 MR. EMMONS: Paragraph 24 on page 15.

7 JUDGE CHACHKIN: Yes, page 15.

8 (Pause.)

9 MR. SCHAUBLE: Your Honor, I believe the sentence in
10 the middle of that paragraph makes clear that the decision
11 concerning how the, how the classifications were used would
12 not be, would not be by Mr. Everett, the sponsoring witness,
13 but by the TBN Program Department in California.

14 MR. EMMONS: That's correct.

15 MR HONIG: Then, then the difficulty is that neither
16 the person who does that, nor the definitions and criteria by
17 which they were done, are identified, and without that basic
18 information or -- and, and with or without a witness who can
19 explain it, any references in these exhibits to these logs
20 are, are fatally defective.

21 MR. SCHAUBLE: Your Honor, Mr. Emmons made reference
22 to the issues programs list as somehow validating the classi-
23 fications in the program logs, but there are some problems in
24 that regard. In the issues programs list, "Feedback" is
25 listed as a public affairs/other program but if you go to the

1 program log, "Feedback" is listed as religious/public affairs,
2 so there's actually a conflict between the two as to the
3 designation, and therefore the issues programs list can't --
4 do not validate the classifications of the program log. I
5 mean, there appears to be some lack of consistency as to how
6 the -- Trinity's classifications were filed.

7 JUDGE CHACHKIN: Well, if you wanted these logs to
8 be received, you're going to have to bring someone from
9 California who can tell you what -- how they made these deter-
10 minations.

11 MR. EMMONS: Well, we can do that, Your Honor.

12 JUDGE CHACHKIN: Well, that's what you'll have to
13 do. You'll have to have someone qualify these in this
14 exhibit.

15 MR. SCHAUBLE: Your Honor, I think they had a full
16 opportunity to do so in their direct case exhibits, and I
17 think now is a -- I think now, you know -- they had every
18 opportunity to prepare their exhibits in a competent fashion
19 and I think it's -- the time has come and passed for, for
20 turning to try and repair this defective exhibit.

21 JUDGE CHACHKIN: I'll let them put on a sponsoring
22 witness if they have one who could sponsor these logs, and you
23 can question them.

24 MR HONIG: Your Honor, will such a witness be
25 expected to exchange written testimony in advance of his or

1 her appearance?

2 JUDGE CHACHKIN: Well, I think he should exchange
3 written testimony so that the parties could be in a position
4 to cross examine him.

5 MR. EMMONS: True.

6 JUDGE CHACHKIN: All right, we'll be in recess until
7 9:30 tomorrow morning.

8 (Whereupon, a recess was taken until November 30,
9 1993.)

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Docket No.

WASHINGTON, D.C.

Place

NOVEMBER 29, 1993

Date

We, the undersigned, do hereby certify that the foregoing pages, numbers 177 through 370, inclusive, are the true, accurate and complete transcript prepared from the reporting by ALICE WEHNER in attendance at the above identified proceeding, in accordance with applicable provisions of the current Federal Communications Commission's professional verbatim reporting and transcription Statement of Work and have verified the accuracy of the transcript by (1) comparing the typewritten transcript against the reporting or recording accomplished at the proceeding and (2) comparing the final proofed typewritten transcript against the reporting or recording accomplished at the proceeding.

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